

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

DOCUMENT DYNAMICS, LLC,)	
)	
Plaintiff,)	
)	Civil Action No. 3:18-cv-00411-AVC
v.)	
)	
XEROX CORPORATION,)	
)	March 15, 2019
Defendant.)	
)	

DECLARATION OF ELIZABETH A. ALOQUIST

I, Elizabeth A. Alquist, hereby declare under penalties of perjury:

1. I am a member of the bar of the State of Connecticut, and a partner at the law firm of Day Pitney LLP. I serve as counsel for the Defendant Xerox Corporation (“Xerox”) in the above captioned action.
2. I submit this Declaration in support of Xerox’s Summary Judgment Motion of Invalidity.
3. Exhibit A, attached hereto, is a true and accurate copy of US Patent No. 7,782,772 (filed Mar. 12, 2007).
4. Exhibit B, attached hereto, is a true and accurate copy of Document Dynamics, LLC’s Opening Expert Report of Glenn Weadock Regarding Infringement (“Weadock Report”).
5. Exhibit C, attached hereto, is a true and accurate copy of US Patent Application Publication No. 2005/0259289 (“Ferlitsch”) (filed May 10, 2004) (published Nov. 24, 2005).
6. Exhibit D, attached hereto, is a true and accurate copy of US Patent No. 7,190,478 (filed May 29, 2002).

7. Exhibit E, attached hereto, is a true and accurate copy of US Patent Application Publication No. 2003/0223092 (“Caffary”) (filed May 29, 2002) (published Dec. 4, 2003).
8. Exhibit F, attached hereto, is a true and accurate copy of US Patent Application Publication No. 2002/0101600 (“Sabbagh”) (filed Jan. 29, 2001) (published Aug. 1, 2002).
9. Exhibit G, attached hereto, is a true and accurate copy of Xerox, *DP Server Solutions Guide* (2d ed. 1999) (“DP Server”).
10. Exhibit H, attached hereto, is a true and accurate copy of US Patent No. 6,832,250 (“Coons”) (filed Apr. 13, 2000) (issued Dec. 14, 2004).
11. Exhibit I, attached hereto, is a true and accurate copy of US Patent Application Publication No. 2003/0197887 (“Shenoy”) (filed Apr. 18, 2002) (published Oct. 23, 2003).
12. Exhibit J, attached hereto, is a true and accurate copy of Internet Archive, *DP Server Product Overview*, [https://web.archive.org/web/20001101111127/http://www.xerox.com:80/go/xrx/software/overview.jsp?id=DP Server+&cat=/Software/Software+Associated+with+Xerox+Products&cat=/Software/Software+Associated+with+Xerox+Products](https://web.archive.org/web/20001101111127/http://www.xerox.com:80/go/xrx/software/overview.jsp?id=DP%20Server+%26cat=/Software/Software+Associated+with+Xerox+Products&cat=/Software/Software+Associated+with+Xerox+Products) (last visited Mar. 15, 2019). The webpage shows that DP Server was publicly disseminated by November 1, 2000 at the latest.

Executed on this 15th day of March 2019.

By: /s/ Elizabeth A. Alquist
Elizabeth A. Alquist